



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

05 MAY 1986

Mr. Lee Cunningham  
Hearing Officer  
Illinois Pollution Control Board  
State of Illinois Center  
100 West Randolph Street  
Chicago, Illinois 60601

Dear Mr. Cunningham:

The United States Environmental Protection Agency (USEPA), Region V, is hereby submitting comments regarding Particulate Emission Limitations, Rules 203(g)(1) and 202(b) of Chapter 2. Region V is submitting comments on the Illinois Environmental Protection Agency's (IEPA) proposed Sections 212.126 and 212.124(c).

Section 212.126 - Adjusted Visible Emissions Limitations

Region V could recommend approval of this section, provided that any adjusted visible emission limitation that the Board establishes would be submitted to USEPA as a SIP revision.

Also, we feel that one part [212.126(e)(4)] of this section is unclear. Part 212.126(e)(4) provides that:

If the average opacity for two or more overlapping six-minute sets within a 60-minute period exceeds 30%, then the second highest six-minute average shall be selected as the adjusted opacity limitation.

This part would be clarified if it were changed to read;

If the average opacity for any two or more sets of 24 consecutive readings within a 60-minute period exceeds 30%, then the second highest six-minute average shall be selected as the adjusted opacity limitation.

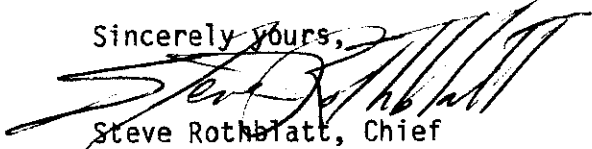
Section 212.124(c) - Compliance with the Particulate Regulation a Defense

Region V could also recommend approval of this section.

The Region feels that Section 212.123, as proposed by IEPA, together with IEPA's proposed Sections 212.124 and 212.126, would provide enforceable opacity limitations without penalizing sources that are in compliance with the applicable mass emission limitations.

We appreciate the opportunity to submit comments during the State's rulemaking process.

Sincerely yours,



Steve Rothblatt, Chief  
Air and Radiation Branch (5AR-26)

cc: Michael Hayes, IEPA